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17 Attorneys for Defendants
18 SAMSUNG ELECTRONICS CO., LTD.
19 and SAMSUNG SEMICONDUCTOR, INC.

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 EDGE ELECTRONICS, INC.

24 Case No. C 07-01207 PJH
25 Case No. C 07-01381 PJH

26 Plaintiff,

27 vs.

28 HYNIX SEMICONDUCTOR, INC.
et al. (Case No. C06-01207 PJH)

29 **STIPULATION AND [PROPOSED]
30 ORDER PROVIDING FOR
31 DEPOSITION OF YOUNG HWAN
32 PARK AFTER HIS RELEASE FROM
33 PRISON IN JANUARY 2008**

34 Defendants.

35 DRAM CLAIMS LIQUIDATION
36 TRUST, By Its TRUSTEE WELLS
37 FARGO BANK, NA,

38 Plaintiff,

39 vs.

40 HYNIX SEMICONDUCTOR INC.,
41 et al. (Case No. C07-01381 PJH)

42 Defendants.

1 WHEREAS, Plaintiffs Edge Electronics, Inc. and DRAM Claims
2 Liquidation Trust ("Plaintiffs") have noticed the deposition of Young Hwan Park
3 ("Mr. Park") at the Federal Correctional Complex in Lompoc, California to occur on
4 a mutually agreeable date, pursuant to the Stipulated Order for Leave to Depose
5 Prisoners Pursuant to Fed. R. Civ. P. 30(a), signed by this Court on October 26,
6 2007;

7 WHEREAS, the current fact discovery cut-off in these cases is
8 December 17, 2007;

9 WHEREAS, Mr. Park is scheduled to be released from prison in
10 January 2008;

11 WHEREAS, the parties jointly agree that for the convenience of all
12 parties and counsel, it would be better to conduct Mr. Park's deposition after his
13 release from prison;

14 WHEREAS, Defendants Samsung Electronics Co., Ltd. and Samsung
15 Semiconductor, Inc. (collectively, "Samsung") are willing to have Mr. Park's
16 deposition taken after the December 17, 2007 fact discovery cut-off date;

17 WHEREAS, Plaintiffs have agreed to let Mr. Park return to Korea upon
18 his release from prison and then return to the United States for his deposition;

19 WHEREAS, Samsung agrees to produce Mr. Park for his deposition in
20 the United States at its expense as soon as reasonably practicable, given the
21 necessity to obtain a visa, but in no event later than March 1, 2008;

22 WHEREAS, Plaintiffs agree that Samsung's agreement to conduct Mr.
23 Park's deposition after the December 17, 2007 fact discovery cut-off date applies
24 only to the deposition of Mr. Park and does not apply to any other deponents or
25 discovery;

26 WHEREAS, Plaintiffs agree that Samsung's agreement to conduct Mr.
27 Park's deposition after the December 17, 2007 fact discovery cut-off date will not be

1 referenced by Plaintiffs in any application to extend the discovery cut-off date
2 against Samsung or any other Defendant;

3 NOW THEREFORE, PLAINTIFFS AND SAMSUNG, THROUGH
4 THEIR RESPECTIVE COUNSEL, HEREBY STIPULATE to the Court entering
5 the attached Proposed Order.

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7 Stipulated by:

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LINDQUIST & VENNUM PLLP

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By: John C. Ekman (*pro hac vice*)
Attorneys for
DRAM CLAIMS LIQUIDATION
TRUST

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CROWELL & MORING LLP

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By: Jerome A. Murphy (*pro hac vice*)
Attorneys for
EDGE ELECTRONICS, INC.

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SHEPPARD MULLIN RICHTER &
HAMPTON LLP

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/s/ David R. Garcia

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By: David Garcia
Attorneys for
SAMSUNG ELECTRONICS CO,
LTD. AND SAMSUNG
SEMICONDUCTOR, INC.

1 [PROPOSED] ORDER
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3 The Court hereby ORDERS:

4 1. The deposition of Y.H. Park may occur after the December 17,
5 2007 fact discovery cut-off date.

6 2. This order does not authorize the deposition of any individual
7 other than Mr. Park or any other discovery after the December 17, 2007 fact
8 discovery cut-off date.

9 3. Mr. Park may return to Korea after his release from prison on
10 January 8, 2008 and will return for his deposition in the United States.

11 4. After Mr. Park's return to Korea, Samsung is ordered to produce
12 Mr. Park for deposition in the United States at its expense as soon as reasonably
13 practicable, given the necessity to obtain a visa, but in no event later than March 1,
14 2008.

15 5. Plaintiffs may not reference Samsung's agreement to conduct Mr.
16 Park's deposition after the December 17, 2007 fact discovery cut-off date in any
17 application to extend the discovery cut-off date against Samsung or any other
18 Defendant

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20 **IT IS SO ORDERED.**

21 Dated: 11/26/07

